

FILED/ACCEPTED

FEB 222008

February 5, 2008

Federal Communications Commission Office of the Secretary

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Tate
Commissioner Robert McDowell

2008-FEB 17 FD

Federal Communications Commission 115 12th Street, S.W. Washington DC 20554

Re:

In the Matter of Broadcast Localism (MB Docket No. 04-233)

Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

It has come to my attention that the Federal Communications Commission recently issued a Notice of Proposed Rulemaking regarding broadcast localism. It appears this proceeding is seeking to ensure that broadcasters fulfill their obligation of addressing the needs of their local communities.

On behalf of the nonprofit American Sports Institute, I wish to say that it has been our experience over the past 20 years that KGO-TV and KGO-Radio, the local ABC television and radio affiliates in San Francisco, have gone above and beyond their local broadcast responsibility to the community.

Since 1989, both KGO-TV and KGO-Radio have supported the efforts of the American Sports Institute through our educational programs that address the serious issues facing America's troubled public-school system. During this time, both KGO-TV and KGO-Radio have produced countless news stories about the work we do and have helped generate much-needed funds to support our efforts. Through this process, we have positively impacted the lives of thousands of students, many of whom come from low-income, disadvantaged backgrounds. In fact, researchers affiliated with the Office of Educational Research and Improvement (OERI) in the United States Department of Education have hailed one of our programs as "a model for total school reform . . . that addresses the needs of the whole learner." It is safe to say that without the support of KGO-TV and KGO-Radio, our chances of generating this type of success would have been seriously compromised.

And while KGO-TV and KGO-Radio have been instrumental regarding the results we have produced to date, they continue to work with us to further our efforts to help transform our nation's public-school system. On February 28, 2008, in just a few weeks, both KGO-TV and KGO-Radio will carry on their respective websites (abc7news.com and kgoam810.com) the first-ever, day-long, videostreaming telethon on the internet—or web-a-thon—to raise funds for a

AMERICAN SPORTS INSTITUTE

- No∵of Copies rec'd<u></u> U_ABCDE tuition-free, privately-funded, community-based school that is modeled after the program that the researchers at OERI call "a model for total school reform." Both broadcast organizations have donated tens-of-thousands of dollars worth of staff, equipment, and facilities to help the American Sports Institute produce the programming that makes the web-a-thon possible. Quite simply, KGO-TV and KGO-Radio are instrumental in helping us create this school that will include a large proportion of students and families from low-income, disadvantaged backgrounds. And not only will the web-a-thon raise funds for the school, it will generate a tremendous amount of visibility because the it will be on the internet and will be accessed by Americans all across the country.

The web-a-thon will include highly-visible and highly-respected presenters from education, sports, and health, including researchers from Harvard, Stanford, UCLA, the University of Illinois, the University of California at Berkeley, and other universities. Sports figures will include Tony La Russa, Dusty Baker, Joe Morgan, Jennifer Azzi, Brad Gilbert, Al Attles, John Doyle, and Omar Vizquel. And we'll have representatives from the California Legislature and local philanthropic communities.

Given all that KGO-TV and KGO-Radio have done and continue to do for the American Sports Institute, it goes without saying that additional regulations related to broadcast localism and community responsibility are not needed. Both organizations are already going beyond what is required of them. We consider KGO-TV and KGO-Radio to be champions in the communities they serve throughout the San Francisco Bay Area.

If I can be of further assistance regarding this matter, please do not hesitate to call upon me.

Sincerely

Joel Kirsch, Ph.D.

President

c: Michelle Carey
Rick Chessen
Rudy Brioche
Amy Blankenship
Cristina Pauze
Monica Desai
Nancy Pelosi
Lynn Woolsey



EC Southern $ext{Continuous}$ Southern $ext{Continuous}$

University of Southern California, 3651 Trousdale Parkway, Suite 169, Los Angeles, CA 90089-0742 Phone: 213-740-5843 Fax: 213-740-0011 E-Mail: scec@usc.edu Web: www.scec.org

an NSF+USGS center

2008 FEB 11 F 3: 21FILED/ACCEPTED

2/4/08

FEB 2 2 2008

Chairman Kevin Martin Federal Communications Commission 445 12th Street, S.W. Washington DC 20554

Federal Communications Commission Office of the Secretary

Subject: In the Matter of Broadcast Localism (MB Docket No. 04-233), Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Chairman Martin,

KABC-TV has been a valuable partner in our efforts to communicate earthquake preparedness information to the public, an important service to the local communities of southern California, where earthquakes are an ever-present threat.

I understand that The FCC recently initiated a Notice of Proposed Rulemaking on broadcast localism and that you are concerned that broadcasters may not be adequately serving their local communities. While I do not know what is considered adequate, I have been very impressed with the commitment and performance of ABC7 to provide community-oriented information and services in southern California-for the region as a whole but also for the many cultural and geographic communities throughout the area.

In particular, in 2007 KABC-TV initiated and implemented a broad partnership of emergency preparedness organizations to create the "Ready SoCal" campaign with the goal of providing preparedness information and materials. KABC-TV developed a series of news features on earthquakes, fires, flooding, bioterrorism, and other hazards, and ran a series of public service announcements throughout September that promoted a special webpage within its Community website. The partner organizations worked together to distribute a pamphlet with preparedness instructions (in both English and Spanish) and a special documents holder for storing copies of identification, insurance, and other essential items. Also, a local preparedness fair was held in an inner-city community of Los Angeles.

We have already discussed continuing the partnership and developing the campaign into a year-round effort with increased involvement of organizations throughout the many counties of Southern California. Providing a consistent source of quality information is very important in our goal to help people prepare themselves for disasters.

In short, it seems that no further regulation is needed to ensure that KABC-TV continues to serve the local community in these and other ways.

Sincerely,

Mark Benthien

Director for Communication, Education and Outreach

Cc: Michelle Carey, FCC

Teresa Samaniego, KABC-TV

Wash genthier

No. of Copies rec'd 0 _____

Word Arts West

SAN FRADOGESCO THE PROPERTY DANCE FESTIVAL

February 12, 2008

FILED/ACCEPTED

FEB 222008

Commissioner Deborah Tate Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Federal Communications Commissing-Office of the Secretary

Re: In the Matter of Broadcast Localism (MB Docket No. 04-233)

Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Commissioner Tate,

I noted with great interest that the FCC recently issued a Notice of Proposed Rulemaking on broadcast localism. From what I understand, this proceeding is intended to "ensure that broadcasters are appropriately addressing the needs of their local communities." I wanted to be one of the first to tell you that, in my view and in the view of my organization, World Arts West, KGO-TV already serves our community in many ways that makes any additional federal regulation unnecessary.

We have worked with KGO-TV on a number of public service announcements that have greatly raised local awareness of World Arts West. For several years, KGO-TV has helped our organization significantly through sponsorship of our programs, the San Francisco Ethnic Dance Festival and People Like Me. With their help we have been able to advance cultural understanding and increase appreciation of the world's diverse dance traditions, here in the San Francisco Bay Area.

As part of their local and community coverage, KGO-TV has also produced and aired stories of several of our Festival performers. In 2004, KGO-TV aired a profile on former board member and Haitian dance master Blanche Brown. Features like these have raised the profile on our organization's work. Additionally, KGO-TV sent news anchors to emcee our annual fundraising Gala. Cheryl Jennings emceed our annual Gala last year and helped us raise over \$90,000 on our opening night.

For years, our residents have relied on KGO-TV for accurate and detailed emergency and weather information. This information goes far beyond a weather report to include advance warnings of weather

Fort Mason Center • Landmark Building D • San Francisco, CA 94123 www.worldartswest.org • % 415.474 3914 • 415.474.3922 emergencies, notifications of evacuation routes, locations of relief stations, and geographically targeted updates. KGO-TV's ABC7 news channel has been constantly providing reports on local weather and emergencies, e.g., California fires, Katrina, and tornados.

To put it simply, KGO-TV has helped promote World Arts West's branding. It has helped our organization move faster towards its goal of serving the needs of our diverse communities by way of inter-cultural understanding through music and dance. Moreover, KGO-TV's public service announcements, web promotions, profile and stories of our diverse performers have helped spread our message to the community-at-large. For this we are grateful to KGO-TV.

It is because of my first-hand experience with such a long-standing partnership that I am curious as to why the FCC deems it necessary to issue additional regulations. In my view, our community already is well served by KGO-TV and no national regulation could create the kind of great local partnership that we already enjoy.

Sincerely,

Julie Mushet

Executive Director, World Arts West



Filling pantries. Filling lives.

04-233

Board of Directors

Chair Nachuel Marx The Krager Company

Vice Chair undo TSiack United Way of Greater Houston

Secretary
Toseph Stesma
Northwestern Matrial Financial Network

Treasurer Mana Francis RRP insurance Services

President/CEO Brian Greene

Directors Anaisw Alexander Weingarten Realty Investors

Wairen Brice Houston Food Bank, Retired

Clara Cooper Target Hunger

Charic M. Doniels ExxenMobil Global Services Company

Gary Homberger Homberger Bros. Properties, Inc.

Amaid Knache Society of St. Vincent de Paul, Diocese of Galveston-Houston

Cororya Meyo Voltaer Public Relations

Michele Newmon Johnson, Ferguson, Fipkin & Phillips

Armondo Perez H. E. Butt Grocery, Inc.

Kevin K. Rech JPMorgon Chase Bank, N.A.

Clerin Reitman Thomason & Knight <u>e</u>P

Yvorkie Schneider American Express havel

Cori Scott University of Houston

Stephanie Slobin Braceweil & Gruhani LLP

Mothew Winter ArG American General Life Componies February 8, 2008

Commissioner Deborah Taylor Tate Federal Communications Commission 445 12th Street, S.W. Washington DC 20554 FILED/ACCEPTED

FEB 2 2 2008

Federal Communications Commission Office of the Secretary

Dear Commissioner Tate:

I understand that the FCC recently initiated a Notice of Proposed Rulemaking on broadcast localism, which asserts that broadcasters may not be adequately serving their local communities.

As president of the Houston Food Bank and as a citizen of this community, I do not believe that this applies to KTRK-TV, known in Houston as ABC-13. The Houston Food Bank is just one of many local organizations that are supported and sustained through the efforts of KTRK-TV.

For 27 years, KTRK-TV has been making an incredibly generous donation of broadcast time as well as staff and financial resources to the Food Bank through the annual Share Your Holidays Food Drive in December.

KTRK-TV's commitment to the event is extensive. Examples include: recruitment of community participants to both hold food collections and to serve as collection points, such as area schools, police and fire departments; production and distribution of printed communications materials; and coordination of all on-site logistics for an all-day food collection – including tents, heaters, tables, chairs, etc.. The station's on-air contribution includes production and airing of several versions of public service announcements and a full one-hour remote broadcast on the culminating day of the food drive as well as cut-ins during regular programming throughout the day.

In addition to the Share Your Holidays Food Drive, KTRK-TV overrides the broadcast community's stereotypical aversion to competition by joining the other major media outlets in support of the Souper Bowl of Caring Food Drive, which includes a commitment to broadcast public service announcements for several weeks leading up to a weekendlong food collection on Super Bowl weekend.

Throughout the year, KTRK-TV routinely features the Houston Food Bank in its community affairs programming, and the news department is responsive to our requests for news coverage that highlights various aspects of the problem of hunger in the greater Houston area.

of Cupies recid *O* ASCUE

negrigery)

America's Second Harvest The Nation's food Bank Network The Houston Food Bank, like many other local organizations that benefit, is grateful for KTRK-TV's support, and we have every reason to anticipate that the station will continue to work in partnership with us as we lead the fight against hunger.

Sincerely

Brian Greene President/CEO